

[Exhibit 13]

Non-Interference Compliance

Regarding Facility id 147531

Channel 237

Description of Exhibit 13 Contents

This exhibit demonstrates that the proposed facility complies with contour overlap and interference protection provisions in all of the applicable rule sections and that this application for a construction permit is in full compliance with 47 C.F.R. § 74.1204.

Let it be noted that should any actual real world interference occur, the applicant acknowledges that it will promptly suspend operation of this translator in accordance with 47 C.F.R. § 74.1203.

Page 2 of this exhibit is an explanation of the method used to demonstrate compliance with contour overlap and interference provisions based on 47 C.F.R. § 74.1204(d), which states:

[A]n application otherwise precluded by this section will be accepted if it can be demonstrated that no actual interference will occur due to intervening terrain, lack of population or such other factors as may be applicable.

Page 3 of this exhibit contains the tabulated data from the interference analysis, which shows all stations whose protected contours come within 50 km of the 34 dB μ F(50,10) contour of the proposed translator. These tabulated values were calculated using data from the FCC's CDBS files and 30 arc second terrain data. The column labeled "Adj" shows the number of channels difference between the entry and the proposed translator. The column labeled "Dist" shows the distance in km. The column labeled "Overlap" shows the area of contour overlap in square kilometers.

Page 4 of this exhibit is a portion of a USGS 1:24,000 scale 7.5 minute quadrangle at full scale with the calculated area of interference overlaid. The sheet includes the quadrangle name and measurement scale at the bottom-left corner (note: "Mt" refers to meters). The area of interference was calculated using the free space equation and 120 radials.

Page 5 of this exhibit is an aerial photo of the vicinity surrounding the proposed translator's tower site.

Note: The only buildings within the zone of predicted interference are uninhabited communication shelters so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

Compliance with 47 C.F.R. § 74.1204(d)

All authorized second and third adjacent stations with which the proposed translator has contour overlap are tabulated below. Column four show the station's signal level at the proposed translator's tower site, and column five gives the minimum value within the entire standard interfering contour of the proposed translator (100 dBμ for most classes, 94 for class B, 97 for class B1). The minimum second or third adjacent F(50,50) contour within the proposed translator's standard interfering contour was used to calculate the proposed translator's actual "worst-case" interfering contour.

Application_id	File Number	Callsign	Contour at Tower	Min. Contour
97734	BMLH19870212KB	KGGO	68.6	68.6
	Minimum F(50,50) Contour of Adjacent Station within Proposed Translator's Standard Interfering Contour			68.6

FCC 02-244 at Section II.A.5 states that "when demonstrating that 'no actual interference will occur due to . . . other factors,' pursuant to Section 74.1204(d), an applicant may use the undesired-to-desired signal ratio method." The undesired-to-desired ratio for second and third adjacent stations required by § 74.1204(a) is 40 dB. Since the minimum protected contour strength within the proposed translator's standard interference contour is **68.6 dBμ**, this makes the proposed translator's worst-case interfering contour **108.6 dBμ**. By the free-space equation, this contour is calculated to extend a maximum of **82.4 m** from the transmit antenna.

The interfering contour of the proposed translator was calculated for 120 radials and plotted on the pertinent portion of a USGS quadrangle (page 4 of this exhibit). As demonstrated on the quadrangle, there are no populated structures or highways within the area of interference (Note: FCC 02-244 at Section II.A.6 states that USGS quadrangles "have been recognized as acceptable to demonstrate lack of population").

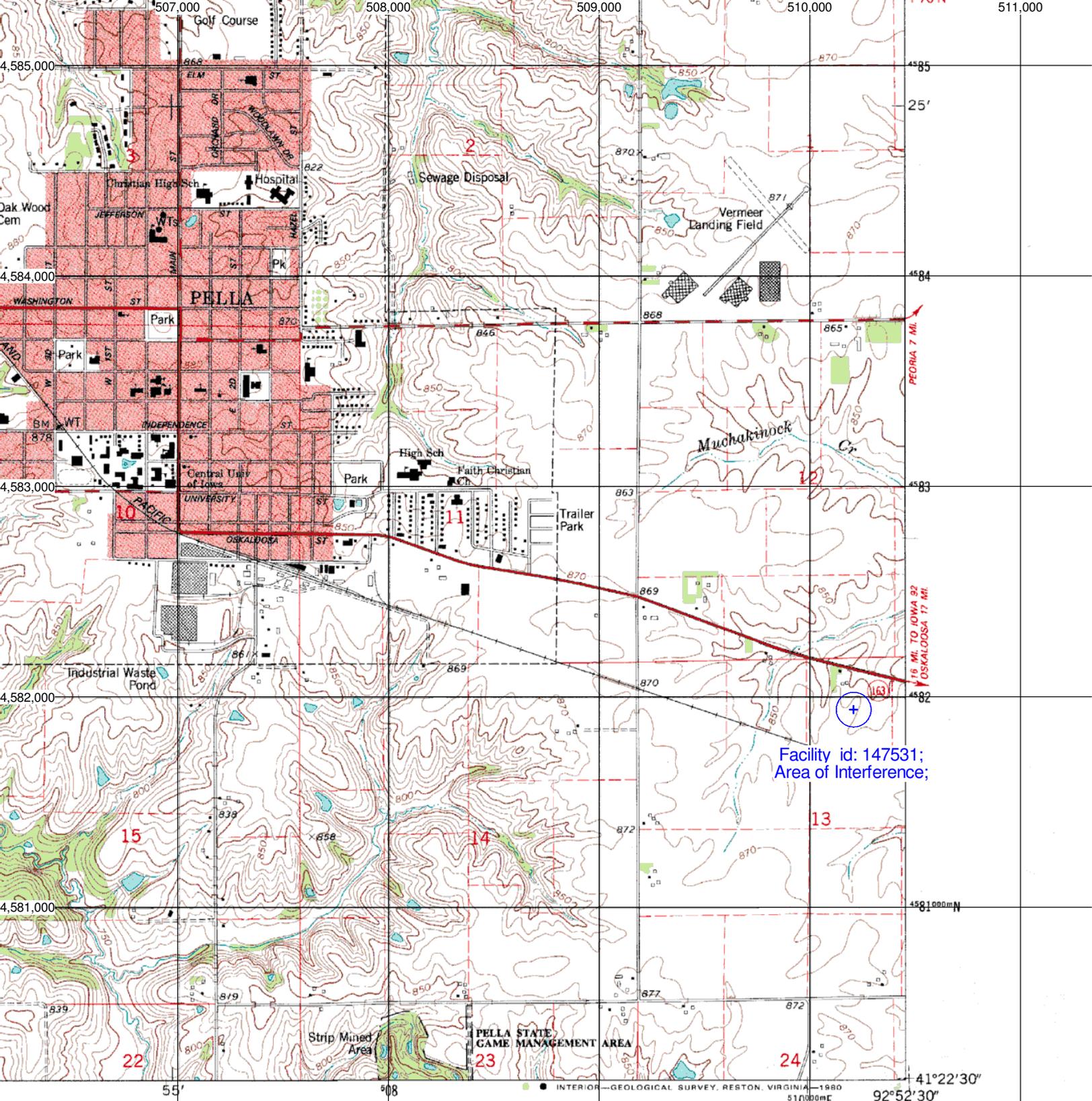
Note: The only buildings within the zone of predicted interference are uninhabited communication shelters so a lack of population has been demonstrated within the area of interference and this application is therefore in full compliance with 47 C.F.R. § 74.1204.

Antenna Manufacturer: WRL
Antenna Model: FMPV1
CORAGL: 4 m
Maximum ERP: 0.01 kW
Interfering Contour: 108.6 dBμ
Max Int. Contour Distance: 82.4 m

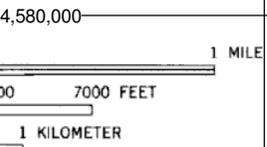
Adjacent Channel Study
For Station K237DH, Facility_id: 147531

Co-channel through third adjacent:

Application_id	Facility_id	Prefix	ARN	Call	Licensee	Class	City	State	Status	ERP	RCAMSL	Channel	Adj	Dist	Overlap
97734	12965	BMLH	19870212KB	KGGO	RADIO LICENSE HOLDING CBC, LLC	C0	DES MOINES	IA	LIC	100	597	235	2	55.1	0.0597
187646	9899	BLH	19930628KF	KCOB-FM	NEWTON LICENSE CO, LLC	A	NEWTON	IA	LIC	5.1	385	240	3	40.2	0
645334	152213	BNPFT	20030317DSX	NEW	RADIO ASSIST MINISTRY, INC.	D	DES MOINES	IA	APP	0.17	358.1	238	1	56.3	0
107836	12965	BLH	19871218KE	KGGO	RADIO LICENSE HOLDING CBC, LLC	C0	DES MOINES	IA	LIC	58	362	235	2	61.9	0
248180	14846	BLH	19970605KA	KZAT-FM	GRUPO ROBLE, LLC	A	BELLE PLAINE	IA	LIC	4.4	382	238	1	73.2	0
174242	23037	BLH	19920604KD	KKFD-FM	FAIRFIELD LICENSE CO, LLC	A	FAIRFIELD	IA	LIC	4.1	349	240	3	79.8	0
1401398	12965	BXPH	20101012ABV	KGGO	RADIO LICENSE HOLDING CBC, LLC	C0	DES MOINES	IA	CP	15	444	235	2	86.2	0



Facility id: 147531;
Area of Interference;



ROAD CLASSIFICATION

Primary highway, hard surface	Light-duty road, hard or improved surface
Secondary highway, hard surface	Unimproved road
○ Interstate Route	○ U. S. Route
	○ State Route

PELLA, IOWA
NW/4 PELLA 15' QUADRANGLE
N4122.5-W9252.5/7.5

1980
DMA 7466 IV NW-SERIES V876

